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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,  
Debtors.<sup>1</sup>**

**PURDUE PHARMA L.P., et al.,  
Plaintiffs,  
v.**

**COMMONWEALTH OF MASSACHUSETTS, et al.,  
Defendants.**

**Chapter 11**

**Case No. 19-23649 (RDD)  
(Jointly Administered)**

**Adv. Pro. No. 19-08289 (RDD)**

**DEBTORS' RESPONSE TO OBJECTION PURSUANT TO FIFTH AMENDED ORDER  
GRANTING MOTION FOR A PRELIMINARY INJUNCTION**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. On January 22, 2020, Purdue Pharma L.P. and certain other debtors in the above-captioned chapter 11 cases (“**Debtors**”) served plaintiffs in the action captioned *City of Alma, GA, et al. v. Purdue Pharma L.P., et al.*, Sup. Ct. Suffolk Cnty. 400031/2019 (Filed Dec. 26, 2019), (“**Objecting Plaintiffs**”) with notice of the *Fifth Amended Order Pursuant to 11 U.S.C. § 105(a) Granting Motion for a Preliminary Injunction* (Adv. Pro. No. 19-08289 ECF 132) (the “**Preliminary Injunction Order**”). Pursuant to the Preliminary Injunction Order, any objection to the entry of the Preliminary Injunction Order against the Objecting Plaintiffs was due on January 29, 2020, seven days after service on January 22, 2020. (*See* Adv. Pro. No. 19-08289 ECF 132 at 7; *see also* Notice of Service of Fifth Amended Order Granting Preliminary Injunction on Additional Actions and Applicable Plaintiffs, Adv. Pro. No. 19-08289 ECF 133.)

2. On January 31, 2020, the Objecting Plaintiffs filed an untimely objection (the “**Objection**”) which stated, in full, that the Objecting Plaintiffs “notify the [C]ourt of their objection to the [C]ourts [*sic*] Fifth Amended Order Pursuant to 11 U.S.C. § 105(a) enjoining commencement of litigation against Purdue Pharma, L.P., *et al.*” (Case No. 19-23649 ECF 794 at 2.)

3. The Debtors respectfully request that the Court overrule the Objection for the reasons set forth in the Court’s ruling on Debtors’ *Motion for a Preliminary Injunction* (*see* Hr’g Tr. at 253:19-268:17, Adv. Pro. No. 19-08289 (Bankr. S.D.N.Y. Oct. 11, 2019); *see also* Hr’g Tr. at 89:1-97:23, Adv. Pro. No. 19-08289 (Bankr. S.D.N.Y. Nov. 6, 2019)), the Debtors’ *Memorandum of Law in Support of Motion for a Preliminary Injunction* and its supporting declarations and exhibits (Adv. Pro. No. 19-08289 ECF 3, 4, 5, 6), and the *Debtors’ Omnibus Reply Brief in Further Support of Motion for a Preliminary Injunction* and its supporting declarations and exhibits (Adv. Pro. No. 19-08289 ECF 59, 60, 61), and because the Objection is

untimely, and enter the *Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) Granting Motion for a Preliminary Injunction* filed contemporaneously herewith.

Dated: February 5, 2020  
New York, New York

Respectfully Submitted,

/s/ Marc J. Tobak

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